IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

RACHEL M. CHANEY, DOUG C. DAVIS, JULIE M. DAVIS, GARY W. DOSS, AND REBECCA R. DOSS,

Plaintiffs,

v.

PERDUE FARMS INC., FPP BUSINESS SERVICES INC. d/b/a PERDUE FARMS INC., PERDUE AGRIBUSINESS LLC, PERDUE AGRIBUSINESS INCORPORATED d/b/a PERDUE AGRIBUSINESS LLC, PERDUE AGRIBUSINESS GRAIN LLC d/b/a PERDUE AGRIBUSINESS LLC, PERDUE FOODS LLC, and PERDUE FOODS INCORPORATED d/b/a PERDUE FOODS LLC,

Defendants.

C.A. No.: 1:24-cv-02975

RESPONSE TO ORDER FROM COURT (ECF 40)

Defendants hereby submit, attached to this Response, the January 21, 2025 environmental assessment prepared by Langan Engineering and Environmental Services, LLC that was referenced in ECF 37-1.

Dated: April 14, 2025 Respectfully submitted,

101

Venable LLP
Michael B. MacWilliams
(Federal Bar No. 23442)
Elizabeth C. Rinehart
(Federal Bar No. 19638)
750 E. Pratt Street, Suite 900
Baltimore, MD 21202
(410) 244-7400 (phone)
(410) 244-7742 (fax)
mbmacwilliams@venable.com
lcrinehart@venable.com

J. Douglas Baldridge (Federal Bar No. 11023) 600 Massachusetts Avenue, N.W. Washington, DC 20001 (202) 344-4703 (phone) (202) 344-8300 (fax) jbaldridge@venable.com

Derek C. Smith (pro hac vice)
227 West Monroe Street, Suite 1900
Chicago, IL 60606
(312) 210-1521 (phone)
(312) 820-3401 (fax)
dcsmith@venable.com

Counsel for Defendants

CERTIFICATE OF SERVICE AND COURTESY COPY

I HEREBY CERTIFY that on April 14, 2025, I electronically filed this Response with the Court and used the CM/ECF system to serve all parties in this action registered with that system.

I FURTHER CERTIFY that a paper courtesy copy of the Response shall be delivered to the Court within two business days.

/s/ Elizabeth C. Rinehart